



February 25, 2016
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: Core Communications, Inc., et al – 499 Filer ID: 826138
CY 2015 Annual CPNI Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2015 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Core Communications, Inc., et al.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel
Consultant to Core Communications, Inc. et al

cc: Chris Van de Verg - CoreTel
file: CoreTel - FCC
tms: FCCx1601

Enclosures
CR/sp


**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for:	Calendar Year 2015
Name of Company covered by this certification:	Core Communications, Inc., et al.
Form 499 Filer ID:	826138
Name of Signatory:	Chris Van de Verg
Title of Signatory:	General Counsel

I, Chris Van de Verg certify that

1. I am General Counsel of Core Communications, Inc., et al. and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Chris Van de Verg, General Counsel
Core Communications, Inc., et al.

2-24-2016

Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A

Attachment A
Statement of CPNI Procedures and Compliance

Core Communications, Inc., et al.

Calendar Year 2015

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

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Core Communications, Inc., et al.

Statement of CPNI Procedures and Compliance
Calendar Year 2015

Core Communications, Inc., et al. ("CoreTel" or "Company") and its affiliates, provide local exchange services to small and medium-sized business in a handful of states. Service is provided to Internet service providers (ISPs), VoIP application providers and interconnected VoIP providers. The Company does not obtain, retain or use CPNI, including call detail records, to market any telecommunications services and has trained personnel not to use CPNI for marketing purposes. Should CoreTel elect to use CPNI in the future, for marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Procedures guarding against unauthorized access to CPNI are part of the Company's regular monitoring of operations. Company employees are prohibited from disclosing CPNI and has procedures which provide for disciplinary action for such violations, up to and including termination of employment. The Company has implemented language in the employee manual regarding CPNI and the requirements for disclosure. The Company's Customer Service Manager conducts training and enforcement of training regarding the regulation of customer information.

The Company does not disclose call record information over the telephone until the customer is verified. The Company provides its customers with on-line access to CPNI. On-line customers are required to select a username and password to gain access to their account information. In the event of a lost or forgotten password, the Company does not prompt the customer for readily available biographical or account information, but instead emails information to the email account of record, which allows the customer to reset the password.

Core Communications, Inc., et al.

Statement of CPNI Procedures and Compliance
Calendar Year 2015
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Company notifies customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information) , password changes, change in a response to a back-up means of authentication, change to an on-line account, change or creation of an address of record other than at service initiation.

The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

The Company has procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company did not take any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2015.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.